

To eliminate the BOCs' discrimination against independent PSPs and in favor of BOC PSPs, BOCs must be required to reconfigure the existing screening codes associated with access services to which IXCs *do subscribe*, so that a unique code is available for COCOT service as well as coin line service.³⁶ The Bureau should have decided this issue when ruling on the BOC CEI Plans. The Bureau should have ruled that by BOCs transmitting a unique screening code with coin line service, while transmitting a non-unique code with COCOT service, they discriminate heavily in favor of their payphone divisions, providing them with an unwarranted advantage in the collection of per-call compensation from IXCs. Accordingly, the Commission should require BOCs (and other LECs) to provide PSPs using COCOT lines with a screening code that uniquely identifies their lines as payphone lines.

(Footnote continued)
investment in "smart" payphones.

³⁵ Coin line service as currently offered is *not* a practical alternative for independent PSPs. The BOCs' proposed coin line services are not useful to independent PSPs because they do not allow PSPs to select their own end user rates for sent-paid toll calls or overtime local calls. The only rates available with the coin line service are those selected by the BOC's own payphone operation. Nor does BOC coin line service permit PSPs to route non-sent paid calls to the operator service provider of their choice. E.g., Comments of the American Public Communications Council on Pactel's CEI Plan, filed in CC Docket No. 96-128 on February 12, 1997. (The Bureau rejected these claims in their CEI Orders). For these reasons, the Commission must assume that COCOT service will remain the only viable interconnection option for most independent PSPs, while coin line service will be used overwhelmingly by most BOC PSPs. (BellSouth is the only BOC that will no longer use primarily coin line service to provide payphone service.)

³⁶ The relatively few available codes with ordinary access service have to be reallocated because only the non-unique "07" code is currently available. The "07" code only identifies that a line may have restrictions, and requires the IXC to check a database to determine if calls are placed from payphones using COCOT service.

III. SERVICE ORDER PROCESSING

The Bureau failed to require the BOCs to specify in sufficient detail the procedures that they will follow to ensure nondiscriminatory treatment of service ordering requests in situations where a Bell company payphone is displaced by an independent payphone (or vice versa). The Bureau also erroneously held that APCC's request that more detailed descriptions of these procedures be required "is beyond the scope of the installation, maintenance and repair requirement."³⁷

In APCC's comments on the BOC CEI Plans, APCC urged the Bureau to require the BOCs to specify in detail the precise service ordering procedures they would follow when a BOC payphone at a particular location is replaced by an independent PSP payphone, or vice versa.

For example, if a location provider authorizes an independent PSP to replace a BOC's payphone division, and the payphone division claims that a contract is still in force between an independent PSP and the location provider, what procedures does the BOC follow to determine whether to provide service on the same line to the new PSP? What procedures does the BOC follow when there has also been a change (or claimed change) in ownership of the location, and the new and old PSPs have conflicting letters of authorization from the new and old owners?

Such replacement situations have a huge potential for discrimination and unfair marketing by the LEC. The "incoming" PSP is just beginning to develop a relationship

³⁷ E.g., Bell Atlantic CEI Order, ¶¶ 26, 32; SWBT CEI Order, ¶¶ 28, 32; U S West CEI Order, ¶¶ 33, 35, 39; see also BellSouth CEI Order, ¶¶ 26 (failing to address unfair marketing issues, although noting that APCC raised the issues).

with a new location provider, and there is inherently a strong incentive for the BOC to use its monopoly control over the provision of local service in ways that obstruct the smooth transition to a new PSP and encourage the location provider to return to the "safer" choice of a LEC-controlled PSP. Unless the procedures are specified and approved, there is great potential for the BOC service order processing personnel to exercise "discretion" in a way that favors the BOC's own payphone division whenever possible.

The BOCs' CEI plans, and in most cases even their follow-up reply comments and ex parte submissions, did not specify in significant detail the procedures they would follow in replacement situations, beyond vague generalizations that they would treat all PSPs equally, including their own payphone operations.³⁸ Yet, the Bureau's CEI Orders blandly accepted these vague generalizations and declined to require additional detail. Worse, the Bureau found that the potential for unfair marketing inherent in these situations is "beyond the scope of the installation, maintenance and repair requirement." See, e.g., Southwestern Bell CEI Order, ¶ 32.

The Commission should modify this portion of the CEI Orders and require the BOCs to provide full detail on how they will handle payphone replacement situations.

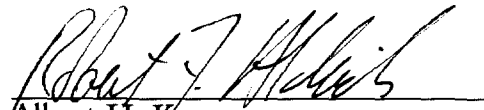
³⁸ PacTel, after being pressed by the California Payphone Association, finally submitted a fairly detailed statement of the specific procedures it would follow. Although even this statement could and should have been supplemented in more detail, it provided a model that the Bureau could and should have required the other BOCs to match in terms of the detail provided. However, the Bureau approved the other BOCs' plans without obtaining or requiring even the level of detail provided by PacTel.

IV. CONCLUSION

For the reasons discussed herein, the Commission should require U S West; NYNEX's subsidiary, New York Telephone Company; and BellSouth to federally tariff their call blocking and call screening services. Further, the Commission should require all LECs to provide PSPs using COCOT lines with a screening code that uniquely identifies their lines as payphone lines. Finally, the Commission should require BOCs to provide specific details in their CEI Plans on how their service ordering procedures will prevent discrimination or unfair marketing practices when BOC payphones are replaced by unaffiliated payphones (and vice versa), including prevention of unfair marketing practices when payphones are replaced.

Dated: May 15, 1997

Respectfully submitted,



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ATTACHMENT

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Implementation of the Pay Telephone
Reclassification and Compensation
Provisions of the Telecommunications
Act of 1996

)
)
)
) CC Docket No. 96-128
)
)
)

**PETITION OF THE AMERICAN PUBLIC
COMMUNICATIONS COUNCIL FOR CLARIFICATION
OR IN THE ALTERNATIVE RECONSIDERATION**

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May 5, 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
)

Implementation of the Pay Telephone)
Reclassification and Compensation)
Provisions of the Telecommunications)
Act of 1996)
_____)

CC Docket No. 96-128

PETITION OF THE AMERICAN PUBLIC
COMMUNICATIONS COUNCIL FOR CLARIFICATION
OR IN THE ALTERNATIVE RECONSIDERATION

Pursuant to Section 1.106 of the Commission's Rules, 47 C.F.R. § 1.106, the American Public Communications Council ("APCC")¹ hereby petitions for further clarification or, in the alternative, for reconsideration of the Common Carrier Bureau's ("Bureau") April 4, 1997 Clarification Order.² In the Clarification Order, the Bureau

¹ APCC is a national trade association of some 1,200 independent (non-telephone company) providers of pay telephone equipment and services. APCC's purpose is to promote fair competition and high standards of service in the payphone and public communications markets.

² Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-678, released April 4, 1997 (CCB) ("Clarification Order"). The Clarification Order clarified Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Report and Order, FCC 96-388, released September 20, 1996 ("Payphone Order"), Order on Reconsideration, FCC 96-439, released November 8, 1996 ("Reconsideration Order"). The Payphone Order, Reconsideration Order and Clarification Order are referred to collectively herein as the Payphone Orders.

explained the 'scope of the Payphone Orders' requirement that local exchange carriers ("LECs") file federal as well as state tariffs for "unbundled features and functions" offered to payphone service providers ("PSPs").

INTRODUCTION AND SUMMARY

The Clarification Order provides important and necessary guidance regarding the scope of the federal tariffing requirements. As discussed in the Payphone Orders, federal tariffing "enables the Commission to directly ensure that payphone services comply with Section 276." Reconsideration Order, ¶ 162. By clarifying that all payphone-specific network-based, unbundled features and functions are subject to federal tariffing, the Clarification Order promotes the availability of important services needed by PSPs at cost-based, nondiscriminatory rates, thereby promoting both payphone competition and "the widespread deployment of payphone services to the benefit of the general public." Clarification Order, ¶ 3 (quoting 47 U.S.C. § 276(b)).

Further clarification is necessary, however, because certain Bell Operating Companies ("BOCs") are continuing to avoid their federal tariffing obligations due to an apparent failure to understand the Clarification Order. These BOCs' continuing refusal to federally tariff blocking and screening services that were specifically named in the Clarification Order necessitates further clarification of the federal tariffing requirements in two respects.

First, the Bureau should clarify that, in accordance with the Computer III regulatory framework,³ "payphone-specific" features include any unbundled feature that payphone service providers ("PSPs") "may require or find useful in configuring [their payphone] service,"⁴ and are not limited to features offered exclusively or predominantly to PSPs. Second, the Bureau should clarify that "unbundled" features are those features that are available but not automatically provided with a basic payphone line, regardless of how the prices are presented on the tariff page. Such clarification is necessary in order to ensure that essential services such as call blocking and screening, which are critical in protecting against fraudulent payphone calling, are available to PSPs at cost-based, nondiscriminatory rates.⁵

I. "PAYPHONE-SPECIFIC" FEATURES AND FUNCTIONS⁶

In defining the features that must be federally tariffed, the Bureau specifically referenced the Computer III Open Network Architecture ("ONA") regulatory framework. In keeping with that parallel, the Bureau should clarify that "payphone-specific" features include "features that [a PSP] may require or find useful in configuring its [payphone]

³ E.g., Clarification Order, ¶ 9 & n.25 (citing Computer III line of cases).

⁴ Clarification Order, ¶ 17 (citing Filing and Review of Open Network Architecture Plans, Phase I, Memorandum Opinion and Order, FCC 88-381, 4 FCC Rcd 1 (1988) (" BOC ONA Order")).

⁵ In the event that the Clarification Order did not define "payphone specific" and "unbundled" as indicated above, APCC requests in the alternative that the order be reconsidered and modified.

⁶ "Features and/or functions" will be referred to collectively herein as "features."

service," and are not limited to features offered exclusively, or even predominantly, to PSPs. Clarification Order, ¶ 17 (citing BOC ONA Order). This clarification is necessary because U S West and possibly other LECs are relying on the Clarification Order as an excuse for failing to federally tariff their blocking and screening services, even though call blocking and call screening were specifically cited in the Clarification Order, (¶ 18 & n.49) as examples of "payphone-specific" services that "must be federally tariffed if they are offered on an unbundled basis" Id., n.49.

U S West initially had filed a federal tariff for its "CUSTOMNET" blocking and screening service. APCC had requested investigation of the tariff filing because U S West was proposing to charge \$5.00 per line per month for a service that according to its own cost support, costs only one cent per line per month. On April 14, 1997 -- four days after filing a letter pursuant to the Clarification Order, representing "[U S West] federally tariffed the network-based payphone specific unbundled features and functions in its intrastate tariffs on January 15, 1997 . . . and is in full compliance with the Commission's federal tariffing requirements . . . ," and one day before the Bureau issued an order approving its CEI plan -- U S West deleted its CUSTOMNET service from its payphone compliance tariff filing. On April 25, 1997, U S West deleted CUSTOMNET from its CEI Plan.⁷ U S West claims that CUSTOMNET is not payphone-specific because it "is also

⁷ U S West's Comparably Efficient Interconnection Plan for Payphone Services, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Amendment of Plan of U S West, Inc. to Offer Comparably Efficient Interconnection for Payphone Services, filed April 25, 1997 ("U S West CEI Amendment") at 2. (A copy of the U S West CEI Amendment (without attachments) is attached for the Bureau's convenience as Exhibit 2).

used by numerous end-user customers other than payphone service providers,"⁸ and that 70% of its CUSTOMNET customers use business or residential lines. Therefore, U S West asserts, it does not have to federally tariff CUSTOMNET.

U S West's interpretation is utterly inconsistent with the language and purpose of the Clarification Order.⁹ First, the Clarification Order states that unbundled features are similar to basic service elements ("BSEs") under the ONA regulatory framework. Clarification Order, ¶ 17. In the BOC ONA Order, the Commission sought to create competition in, and to promote development of, the enhanced service industry. Likewise, in the Payphone Orders, the Commission is implementing the dual goals of Section 276, "promoting both competition among [PSPs] and the widespread deployment of payphone services to the benefit of the general public." Clarification Order, ¶ 3. Thus, the Bureau should reject interpretations of the Clarification Order that hinder payphone competitors from obtaining critical network services at reasonable, cost-based rates.¹⁰ In the BOC ONA

⁸ Id.

⁹ U S West's CUSTOMNET service is essentially a package of blocking and screening options. See U S West's January 15, 1997 Transmittal No. 823 (portions of which are attached as Exhibit 1 for the Commission's convenience). The Bureau *expressly identifies* call screening, Clarification Order, ¶ 18, and call blocking, *id.* at ¶ 18 n.49, as "payphone-specific, network-based, unbundled features and functions." Moreover, even according to U S West, approximately 30% of its subscribers to CUSTOMNET are PSPs. Thus, the feature is obviously of particular use to PSPs and should be considered "payphone-specific."

¹⁰ In fact, the Bureau should be even more vigilant in the implementation of Section 276 because in this context, the BOCs have historically dominated the payphone market and impeded independent PSPs from offering new competition. In the BOC ONA Order, by contrast, the Commission was implementing a regulatory framework that enabled BOCs to enter the enhanced service market for the first time.

Order, the Commission did not require that features must be available *only* to enhanced service providers ("ESPs") in order to be federally tariffed. In applying this Computer III derived requirement to the payphone industry, therefore, the Bureau clearly did not intend to require that payphone-specific features must be available *only* to PSPs in order to be federally tariffed.

Second, the Clarification Order cites as "payphone-specific" several other features that are commonly available to entities other than PSPs. For example, answer supervision is specifically cited as a payphone-specific feature, Clarification Order, ¶ 18, even though it is available to ESPs and other non-payphone subscribers. The Bureau also specifically cited IDDD blocking as a payphone-specific service. *Id.*, ¶ 18 n.49. The Commission recently required LECs to offer IDDD blocking to business customers, in addition to PSPs.¹¹ The Bureau would not have cited answer supervision and IDDD blocking as payphone-specific services if it had intended to require federal tariffing of only services offered exclusively or predominantly to PSPs.

In short, the Clarification Order indicates that the Bureau did not intend to limit federal tariffing of payphone-specific features to only those features predominantly

¹¹ Policy and Rules Concerning Operator Service Access and Pay Telephone Compensation, CC Docket No. 91-35, 11 FCC Rcd 17021, 17027 (1996) (requiring "LECs to offer their federally tariffed international call blocking service on an unbundled basis to all business customers, aggregators and non-aggregators alike") (footnote omitted).

subscribed to by PSPs. To the extent that this was not understood by U S West and other LECs,¹² the Bureau needs to provide clarification.

Certain BOCs have ignored the fact that the Bureau specifically cited answer supervision, call screening, call blocking and IDDD blocking as payphone-specific features.¹³ Therefore, it is necessary for the Bureau to clarify that these features are distinguished from features "generally available to all local exchange customers and ... *only incidental to payphone service.*" Clarification Order, ¶ 18 (emphasis added). The payphone specific features listed by the Bureau are "features that [a PSP] may require or find useful in configuring its [payphone] service," i.e., features that are of particular importance to PSPs.

¹² U S West is apparently not the only LEC applying a restricted interpretation to the Clarification Order. BellSouth's April 9, 1997 submission pursuant to the Clarification Order states, "there are no payphone-specific, network-based, unbundled features and functions provided to others or taken by BellSouth's payphone operations that are tariffed by BellSouth at the intrastate level." (A copy of BellSouth's April 9, 1997 submission is attached for the Bureau's convenience as Exhibit 3.) BellSouth's justification for making this claim is unclear, but BellSouth's claim is addressed in John F. Beach's and Marcus W. Trathen's April 14, 1997 Ex Parte Letters to Secretary William F. Caton, regarding BellSouth's April 9, 1997 submission in CC Docket No. 96-128 (copies of which are attached as Exhibit 4). The particular claims of BellSouth and the responses thereto are related to the Commission's April 15, 1997 BellSouth CEI Order, BellSouth Corporation's Offer of Comparably Efficient Interconnection to Payphone Service Providers, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-792, released April 15, 1997 (CCB) ("BellSouth CEI Order"), and need not be addressed here. However, for purposes of this request for clarification or reconsideration, BellSouth's claim is yet another example of the need for the Bureau to provide further guiding principles governing the LECs' federal tariffing obligations. See also Rochester Telephone Corp., Transmittal No. 21, April 15, 1997, Description and Justification at 2-3.

¹³ See, e.g., BellSouth's April 9, 1997 submission at 1.

In short, the Commission should clarify that "payphone-specific" refers to services that are required or especially useful to PSPs in configuring their payphone service, see Clarification Order, ¶ 17 (citing BOC ONA Order), unlike services such as touchtone service, that are only incidental to PSPs. Moreover, the Bureau should clarify that it did not intend that payphone-specific features are only those features that are used predominantly by PSPs.

II. "UNBUNDLED" FEATURES AND FUNCTIONS

The Bureau should clarify that "unbundled" features should include all features that are available but not automatically provided with the basic payphone line. If a "smart" or "dumb" payphone line can be purchased for different prices depending on whether it is ordered with or without a feature, then the feature is "unbundled."

LECs should not be permitted to escape the federal tariffing requirements simply by phrasing their tariffs a certain way. NYNEX's New York tariff, for example, has several service options that include the payphone line plus various features, and each service option is offered at a different price. Apparently believing that it can characterize the components of these service packages as "bundled," NYNEX has declined to federally tariff any of the blocking and screening features offered in New York.¹⁴

¹⁴ By contrast, NYNEX does propose to federally tariff blocking and screening features offered in New England states, presumably because they are differently configured on the tariff page. See Alan S. Cort's April 10, 1997 Ex Parte Letter to Secretary William F. Caton (attached as Exhibit 5).

However, the blocking and screening features are actually being offered on an unbundled basis. The price NYNEX charges for a particular feature can be determined by subtracting the price of a service option *without* the feature from the price of a service option *with* the feature. For example, the rate for NYNEX's two-way, Basic Public Access Line ("BPAL"), which *does not* include outward call screening ("OCS"), is \$15.47. The rate for NYNEX's two-way, BPAL that *does* include OCS, and is apparently otherwise the same, is \$17.72. Thus, NYNEX charges \$2.25 more for OCS. NYNEX is required to federally tariff OCS as an unbundled function,¹⁵ and to demonstrate that the \$2.25 rate complies with the "new services" test.¹⁶ If NYNEX's blocking and screening features are "unbundled," then any unbundled feature could be transformed into a "bundled" one by simply revising the way that the rates for the feature are presented in the tariff.

In short, the Bureau should clarify that "unbundled" features should include all features that are available but not automatically provided with the basic payphone line.

¹⁵ Keith J. Roland's April 14, 1997 Ex Parte Letter to Secretary William F. Caton, regarding NYNEX Telephone Companies' Comparably Efficient Interconnection Plan for Payphone Services, CC Docket No. 96-128, discusses other examples of unbundled features or functions that NYNEX does not intend to federally tariff. (Mr. Roland's April 14 Ex Parte Letter, and NYNEX's tariff pages, are attached as Exhibit 6 for the Bureau's convenience.)

¹⁶ Because OCS involves a simple transmission of two extra digits in the ANI or BTN stream, which gives an operator service provider notice that a call originates at a pay telephone, the cost of adding the extra digits should be minuscule (and presumably in the same "ballpark" as U S West's one cent per line per month). NYNEX's \$2.25 rate is thus apparently well in excess of cost.. In any event, NYNEX's attempt to evade the federal tariffing requirement demonstrates the importance of the Bureau providing clarification and guidance on the LECs' federal tariffing obligations in order to permit competition in the pay telephone industry.

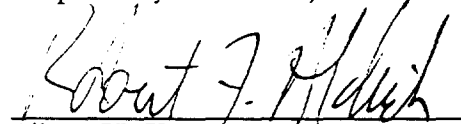
Moreover, the Bureau should clarify that a LEC should not be permitted to evade the federal tariffing requirement by setting up several different categories of service options that include or exclude particular features, and then claiming that the features are not unbundled because they are included in the price of a particular service option, when the same service minus the feature is also available.

III. CONCLUSION

For the reasons set forth herein, the Bureau should clarify (or in the alternative grant reconsideration and declare) that "payphone-specific" features include all features that PSPs "may require or find useful in configuring [their payphone] service," whether or not a majority of subscribers to the feature are PSPs. Second, the Bureau should clarify that "unbundled" features are those features that are available but not automatically provided with a basic payphone line, regardless of how the LECs tariffs are phrased.

Dated: May 5, 1997

Respectfully submitted,



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EXHIBIT 1

U S WEST Communications, Inc.
1801 California Street Room 4740
Denver, Colorado 80202
303 896-1446

John Kure
Director - Public Policy



January 15, 1997

Transmittal No. 823

Secretary
Federal Communications Commission
1919 "M" Street, NW, Room 222 SC1170
Washington, D.C. 20554

Attention: Common Carrier Bureau

The accompanying tariff material, issued on behalf of U S WEST Communications, Inc. d/b/a U S WEST Communications (USWC) and bearing Tariff F.C.C. No. 5, effective as reflected on the attached tariff pages, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended. This material consists of tariff pages indicated on the following check sheet(s):

Tariff F.C.C. No.
5

Check Sheet Revision No.
240th Revision of Page 0-1
30th Revision of Page 0-1.2
31st Revision of Page 0-1.3
17th Revision of Page 0-1.4
19th Revision of Page 0-1.5
18th Revision of Page 0-1.17
45th Revision of Page 0-1.18
42nd Revision of Page 0-1.19

This filing is being made to comply with the FCC's Orders in CC Docket Nos. 96-128 and 91-35, In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996. The filing includes exogenous adjustments to reflect the deregulation of pay telephone sets and a change in NECA Long Term Support. The filing implements the Orders' requirement to apply a multiline business End User Common Line (EUCL) charge to all payphone lines. The filing also restructures the Common Line Charges to recover in the EUCL the revenue requirement for public pay telephone lines formerly recovered in the Carrier Common Line Charge. Tariff language changes have been made to reflect the deregulation of pay telephone sets. Finally, the filing adds four unbundled features currently used by USWC's pay telephone operation in its provision of pay telephone service from smart pay telephones as required by the Orders.

Secretary
Transmittal No. 823
January 15, 1997
Page Two

Supporting information discussed under Sections 61.38 and 61.49 of the Commission's Rules is, to the extent applicable, included with this filing in the attached Description and Justification.

In accordance with Section 61.32(b), the original Transmittal Letter, the Federal Communications Commission Form 159 and the filing fee have been submitted to a courier service for delivery to the Treasury Department lockbox located at the Mellon Bank in Pittsburgh, Pennsylvania.

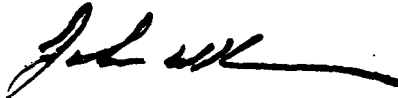
In accordance with Sections 61.32(a) and (c), the appropriate tariff pages and attachments are hereby delivered to the Secretary, Federal Communications Commission, their commercial contractor and the Chief, Pricing Analysis Branch. These actions have been committed on the date established as the issued/filed date as reflected above.

Acknowledgment and date of receipt of this filing are requested. A duplicate letter of transmittal is attached for this purpose.

All correspondence and inquiries in connection with this filing, including service copies of petitions, should be directed to:

Ms. BB Nugent
U S WEST, Inc.
1020-19th Street, NW, Suite 700
Washington, DC 20036
Phone (202) 429-3131
Facsimile (202) 296-5157

Respectfully,

A handwritten signature in black ink, appearing to be "J. L. W.", written in a cursive style.

Attachments:

Duplicate Letter
Tariff Page(s)
Description and Justification

U S WEST Communications
ACCESS SERVICE

TARIFF F.C.C. No. 5
ORIGINAL PAGE 13-41.9

**13. ADDITIONAL ENGINEERING, ADDITIONAL LABOR
AND MISCELLANEOUS SERVICES**

13.3 MISCELLANEOUS SERVICES (Cont'd)

13.3.19 BASIC PUBLIC ACCESS LINE (PAL) OPTIONAL FEATURES

A. Answer Supervision - Lineside

This option provides the capability to deliver "off-hook" supervisory signals from the terminating central office switch to a lineside interface at the originating central office switch. These signals indicate when the called station has answered an incoming call. Answer Supervision will only be provided where technically feasible with Basic PAL Service offered in the Company's general or local exchange tariffs. Rates are set forth in 13.4.3., following.

B. Billed Number Screening

Billed Number Screening (BNS) prohibits collect and/or third number billing calls from being charged to BNS equipped numbers. Callers attempting to place a collect or third number billing calls using a BNS number for billing will be advised by an operator that such billing is unauthorized and the call will not be completed until other payment or billing arrangements are made. BNS is subject to the availability of facilities with Basic PAL Service offered in the Company's general or local exchange tariffs. Collect and/or third number billed calls originating from locations that do not have screening capabilities may not be capable of being intercepted and denied and will be billed, e.g., International calls and calls that do not go through the Billing Validation Authority (BVA) data base. Provision of BNS does not alleviate customer responsibility for completed toll calls. This service is available to customers at no charge.

(N)

(N)

(Filed under Transmittal No. 823.)

Issued: January 15, 1997

Effective: April 15, 1997

U S WEST Communications
ACCESS SERVICE

TARIFF F.C.C. No. 5
ORIGINAL PAGE 13-41.10

**13. ADDITIONAL ENGINEERING, ADDITIONAL LABOR
AND MISCELLANEOUS SERVICES**

13.3 MISCELLANEOUS SERVICES

(T)

13.3.19 BASIC PUBLIC ACCESS LINE (PAL) OPTIONAL FEATURES ((Cont'd)

(N)

C. CUSTOMNET Service

CUSTOMNET Service provides toll access screening options which allow a customer to restrict the classes of chargeable calls originating over some or all of their lines. *CUSTOMNET* Service enables a customer, by means of Company operator identification, to provide toll access but restrict (0/0+) outgoing toll calls to only those calls which are charged to the called telephone (collect), a third number, and/or calling card.

CUSTOMNET Service is offered to individual PAL customers. Two options, described below, are available with this service. The provision of this service may require some customers to change their existing telephone number.

• Option 1

All local and nonchargeable calls, e.g., calls to 800/800-type service numbers, and calls to Company numbers such as repair and public emergency service numbers (such as 911) will be permitted. Calls dialed 1+, including calls to Directory Assistance, will not be permitted. Calls dialed 0/0+ to Directory Assistance will be permitted if alternate billing is provided.

• Option 2

All local calls, nonchargeable calls and calls dialed 1+ will be permitted. With this option, the customer assumes responsibility for all calls dialed 1+ and indemnifies and saves the Company harmless against claims resulting from abuse or fraudulent use of the service.

CUSTOMNET Service is furnished where facilities and operating conditions permit for Basic PAL Service. The Company reserves the right to restrict the screening classes or combinations of classes to standard arrangements. Toll Restriction cannot be applied to lines using *CUSTOMNET* Service. Rates are set forth in 13.4.3., following.

(N)

**13. ADDITIONAL ENGINEERING, ADDITIONAL LABOR
AND MISCELLANEOUS SERVICES**

13.3 MISCELLANEOUS SERVICES

13.3.19 BASIC PUBLIC ACCESS LINE (PAL) OPTIONAL FEATURES ((Cont'd)

D. Blocking for 10XXX1+/10XXX011+

Blocking for 10XXX1+/10XXX011+ prevents 10XXX1+ and 10XXX011+ calls from being completed. Blocked calls will be routed to an announcement. This option is available where facilities and operating conditions permit for Basic PAL Service. Rates are set forth in 13.4.3., following.

(T)

(N)

(N)

(Filed under Transmittal No. 823.)

Issued: January 15, 1997

Effective: April 15, 1997

U S WEST Communications
ACCESS SERVICE

TARIFF F.C.C. No. 5
1ST REVISED PAGE 13-69.3
CANCELS ORIGINAL PAGE 13-69.3

**13. ADDITIONAL ENGINEERING, ADDITIONAL LABOR
AND MISCELLANEOUS SERVICES**

13.4 RATES AND CHARGES - ALL STATES

13.4.3 CHARGES FOR MISCELLANEOUS SERVICE (Cont'd)

L. Synchronization Service

	USOC	NONRECURRING CHARGE	MONTHLY RATE
• Per Interface at 1.544 Mbps on SONET-based facilities	S1F1S	\$199.00	\$5.00

M. Answer Supervision - Lineside
• Per PAL line

AS8L+	15.00	3.95
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(N)

N. CUSTOMNET Service
• Per PAL line

SEA	30.00	5.00
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O. Blocking for 10XXX1+/10XXX011+
• Per PAL line

RTVXY	4.00	0.10
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(N)

(Filed under Transmittal No. 823.)

Issued: January 15, 1997

Effective: April 15, 1997

PUBLIC REFERENCE COPY

U S WEST COMMUNICATIONS, INC.

TARIFF F.C.C. NO. 5

ACCESS SERVICE

DESCRIPTION AND JUSTIFICATION

PAY TELEPHONE COMPLIANCE

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